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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

December 13, 2004

Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our Ester-C® supplements under the Sundown label:

Ingredients: Vitamin C, Calcium, Citrus Bioflavonoid Complex, Rutin, Hesperidin Complex

- Non-Acidic and "Stomach Friendly".
- Vitamin C plays an important role in supporting immune function.
- As an antioxidant, Vitamin C helps neutralize harmful free radicals in cells.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

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